

UNITED STATES DEPARTMENT OF JUSTICE  
OFFICE OF THE UNITED STATES TRUSTEE  
KEVIN M. EPSTEIN  
UNITED STATES TRUSTEE  
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UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

IN RE:	§	
RUSE AUTO TRANSPORT, INC.,	§	CASE NO. 24-10050-SMR
	§	CHAPTER 11
DEBTOR.	§	

**LIMITED OBJECTION TO DEBTOR'S AMENDED APPLICATION TO EMPLOY  
COUNSEL (AMY WILBURN AND GRAVIS LAW, PLLC)**  
**[Dkt. # 32]**

TO THE HONORABLE SHAD M. ROBINSON, UNITED STATES BANKRUPTCY JUDGE:

Kevin M. Epstein, the United States Trustee for Region 7 (U.S. Trustee), objects to *Debtor's Amended Application to Employ Counsel (Amy Wilburn and Gravis Law, PLLC)* (Dkt. # 32) (the Application) because the Application does not comply with Local Rule 2014(b) as the engagement letter attached to the Application was not entered into between Ruse Auto Transport, Inc. (Debtor) and the counsel Debtor seeks to employ under 11 U.S.C. § 327(a). The U.S. Trustee respectfully shows the Court the following:

**INTRODUCTION**

1. On January 21, 2024, Debtor filed its voluntary Petition under Chapter 11 of the Bankruptcy Code. Dkt. # 1.

2. On March 15, 2024, Debtor filed the Application by which it seeks to employ

Gravis Law, PLLC and Amy Wilburn (Applicant) under Section 327(a) and Bankruptcy Rule 2014(a) as its bankruptcy counsel. Dkt. # 32.

3. Attached to the Application as Exhibit A is a copy of an engagement letter for bankruptcy representation dated November 22, 2023, between Debtor and Lincoln Goldfinch Law. Dkt. # 32, pp. 9-17. The engagement letter was signed by Amy Wilburn on behalf of Lincoln Goldfinch Law and Plamen Varbanov, Debtor's managing member. *Id.* at p. 15.

4. Under Local Rule 2014(b)(2), an application to employ any professional under 11 U.S.C. § 327 shall include a copy of the contract setting forth the terms of compensation and the FRBP 2016(b) disclosure of compensation. The Application does not meet the disclosure requirements of Local Rule 2014. The Application does not contain a copy of the contract setting forth the terms of compensation and the FRBP 2016(b) disclosure of compensation between Debtor and the Applicant. Instead, the Application includes a copy of the contract between Debtor and Ms. Wilburn's prior firm, Lincoln Goldfinch Law. Because the Application does not comply with Local Rule 2014(b)(2), the U.S. Trustee requests that the Court deny the Application.

For the foregoing reasons, the U.S. Trustee requests that the Court deny the Application and grant such other and further relief as the Court deems appropriate under applicable law.

Dated: March 18, 2024

KEVIN M. EPSTEIN  
United States Trustee Region 7  
Southern and Western Districts of Texas

By: /s/ Shane P. Tobin  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing pleading was served upon the parties listed on the Debtor's Mailing Matrix (not attached to service copies) by U.S. Postal Service, First Class Mail and/or by electronic means for all Pacer system participants on March 18, 2024.

/s/ Shane P. Tobin

Shane P. Tobin